

REMARKS

This is a full and timely response to the outstanding non-final Office Action mailed September 9, 2005 (Paper No. 3). Upon entry of this response, claims 29-56 are pending in the application. Applicants respectfully request that there be reconsideration of all pending claims.

1. Rejection of Claims 29-56 under 35 U.S.C. §103

Claims 29-56 have been rejected under §103(a) as allegedly obvious over *Dreke et al.* (6,463,471) in view of *Aravamudan et al.* (6,301,609). Applicants respectfully traverse this rejection. It is well established at law that, for a proper rejection of a claim under 35 U.S.C. §103 as being obvious based upon a combination of references, the cited combination of references must disclose, teach, or suggest, either implicitly, all elements/features/steps of the claim at issue. *See, e.g., In re Dow Chemical*, 5 U.S.P.Q.2d 1529, 1531 (Fed. Cir. 1988); *In re Keller*, 208 U.S.P.Q.2d 871, 881 (C.C.P.A. 1981).

A. Claims 29 and 50

i. The proposed combination does not teach “receiving a client request to update DNS information on a DNS server”

Dreke et al. does not disclose, teach, or suggest a client updating DNS information on a DNS server. Instead, *Dreke et al.* discloses a client that updates a user's network presence information on an Internet Presence Information Server (IPIS) (Col. 2, lines 50-60.) As its name suggests, the IPIS in *Dreke et al.* provides information about a particular user's presence (or absence) on the Internet. In contrast, claims 29 and 50 include “DNS information” and “a DNS server.” DNS relates to mapping domain names to IP addresses. Applicants respectfully submit that the IPIS disclosed in *Dreke et al.* is not a DNS server, and that Internet presence information is not DNS information.

Aravamudan et al. also fails to teach, suggest, or disclose a client updating DNS information on a DNS server. Instead, *Aravamudan et al.* discloses an Instant Messaging (IM) server which presumably provides instant messaging services to clients. Applicants respectfully submit that the IM server disclosed in *Aravamudan et al.* is not a DNS server, and therefore any information updated on the IM server would not be considered “DNS information.”

ii. The proposed combination does not teach “the client being subscribed to a domain name”

Neither *Dreke et al.* nor a client subscribed to a domain name discloses, teaches, or suggests a client subscribed to a domain name. First, neither reference discusses domain names at all. Second, even if the existence of a domain name could be inferred by the general discussion of the Internet contained in either reference, noting the mere existence of a domain name is far from disclosing a particular client subscribing to a domain name.

iii. The proposed combination does not teach “updating an entry in an IP address table on the DNS server such that the domain name corresponds with the assigned IP address”

As discussed earlier, *Dreke et al.*’s Internet Presence Information Server (IPIS) is not a DNS server. Therefore, any update to the IPIS discussed in *Dreke et al.* is not an update to a DNS server. However, Applicant will assume, arguendo, that the IPIS in *Dreke et al.* is analogous to a DNS server, and that the newly assigned IP address provided by the client to the IPIS upon Internet logon corresponds to updating an IP address table. Even so, *Dreke et al.* does not discuss domain names at all, where claims 29 and 50 recite a relationship between a client’s domain name and IP address.

Aravamudan et al. also fails to teach, suggest, or disclose the above-described feature. *Aravamudan et al.* discloses an Instant Messaging (IM) server which presumably provides instant messaging services to clients. But the IM server disclosed in *Aravamudan et al.* is not a

DNS server. Furthermore, *Dreke et al.* does not discuss domain names at all. In contrast, claims 29 and 50 recite a relationship between a client's domain name and IP address.

iv. Conclusion

Accordingly, the proposed combination of *Dreke et al.* in view of *Aravamudan et al.* does not teach at least the above described features recited in claims. Since the proposed combination does not teach at least the above-described features recited in claims 29 and 50, a *prima facie* case establishing an obviousness rejection has not been made. Thus, claims 29 and 50 are not obvious under the proposed combination of *Dreke et al.* in view of *Aravamudan et al.*, and the rejection should be withdrawn.

B. Claim 38

i. The proposed combination does not teach “the client being subscribed to a domain name”

Neither *Dreke et al.* nor a client subscribed to a domain name discloses, teaches, or suggests a client subscribed to a domain name. First, neither reference discusses domain names at all. Second, even if the existence of a domain name could be inferred by the general discussion of the Internet contained in either reference, noting the mere existence of a domain name is far from disclosing a particular client subscribing to a domain name.

ii. The proposed combination does not teach “updating an entry in an IP address table on the DNS server such that the domain name corresponds with the assigned IP address”

As discussed earlier, *Dreke et al.*'s Internet Presence Information Server (IPIS) is not a DNS server. Therefore, any update to the IPIS discussed in *Dreke et al.* is not an update to a DNS server. However, Applicant will assume, arguendo, that the IPIS in *Dreke et al.* is analogous to a DNS server, and that the newly assigned IP address provided by the client to the IPIS upon Internet logon corresponds to updating an IP address table. Even so, *Dreke et al.* does

not discuss domain names at all, where claim 38 recite a relationship between a client's domain name and IP address.

As also discussed earlier, the IM server disclosed in *Aravamudan et al.* is not a DNS server. Furthermore, *Dreke et al.* does not discuss domain names at all. In contrast, claim 38 recites a relationship between a client's domain name and IP address.

iii. Conclusion

Accordingly, the proposed combination of *Dreke et al.* in view of *Aravamudan et al.* does not teach at least the above described features recited in claims. Since the proposed combination does not teach at least the above-described features recited in claim 38, a *prima facie* case establishing an obviousness rejection has not been made. Thus, claim 38 is not obvious under the proposed combination of *Dreke et al.* in view of *Aravamudan et al.*, and the rejection should be withdrawn.

C. Claims 30 and 42

Applicants respectfully submit that claims 30 and 42 are allowable for at least the reason that the proposed combination of *Dreke et al.* in view of *Aravamudan et al.* does not disclose, teach, or suggest at least the feature of "wherein the interactive file comprises a first web page that is configured to provide information to the first client and configured to allow the first client to leave a message for the second client" as recited in claims 30 and 42.

The Office Action alleges that the above-described feature is disclosed in Col. 7, lines 21-40 of *Aravamudan et al.* (Office Action, p. 3, section 6.) This section of *Aravamudan et al.* discloses that the Communication Services Platform checks for pending events when the user's online presence is detected, and the IM server communicates this event to the client CPE. "Examples of pending events may include...delivery of WebPages or other packetized

information either specifically requested by the user or returned as a result of predefined keyword search parameters..." (Col. 7, lines 25-35.)

However, a web page previously requested by a user when online and then delivered to the user upon the next login is not one that is "configured to allow the first client to leave a message for the second client" as recited in claims 30 and 42. Nor is a web page of search results one that is "configured to allow the first client to leave a message for the second client" as recited in claims 30 and 42.

Dreke et al. does not disclose, teach, or suggest web pages. Therefore, the proposed combination of *Dreke et al.* in view of *Aravamudan et al.* does not teach at least the above described features recited in claims 30 and 42. Since the proposed combination does not teach at least the above-described features recited in claims 30 and 42, a *prima facie* case establishing an obviousness rejection has not been made. Thus, claims 30 and 42 are not obvious under the proposed combination of *Dreke et al.* in view of *Aravamudan et al.*, and the rejection should be withdrawn

D. Claims 37, 39, 41-49, and 51-56

Since claims 29, 38, and 50 are allowable, Applicant respectfully submits that claims 37, 39, 41-49, and 51-56 are allowable for at least the reason that each depends from an allowable claim. *In re Fine*, 837 F.2d 1071, 5 U.S.P.Q. 2d 1596, 1598 (Fed. Cir. 1988). Therefore, Applicants respectfully request that the rejection of claims 37, 39, 41-49, and 51-56 be withdrawn.

CONCLUSION

Applicants respectfully request that all outstanding objections and rejections be withdrawn and that this application and presently pending claims 29-56 be allowed to issue. If the Examiner has any questions or comments regarding Applicant's response, the Examiner is encouraged to telephone Applicant's undersigned counsel.

Respectfully submitted,

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